

**LAW OFFICES OF SANJAY CHAUBEY**

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December 16, 2024

**BY ECF**

Hon. Judge P. Kevin Castel,  
 United States District Judge  
 United States District Court  
 Southern District of New York  
 500 Pearl Street,  
 New York, NY 10007

*File motion by*  
*January 9, 2025.*  
*No further extension.*  
*This is covered*  
*by Local*  
*Civil Rule 6.*  
*SO ORDERED*  
*J. Castel*  
*USDC*  
*12-17-24*

**Re: Donnelly et al v. Anand et al, Case No: 1:21-cv-9562-PKC**

**Sub:** Extension Request to file Motion to Withdraw with Affidavit and Memorandum of Law

Dear Judge Castel:

This firm represents Defendant *Jonathan Anand* in the above-referenced matter. In accordance with Rule 1(C) of Your Honor's Individual Practices, I am writing this letter seeking extension of time to file a Motion to withdraw as attorney of record.

On November 15, 2024, a letter request pertaining to my termination of representation was made (ECF Document No.: 134). The Honorable Court passed an order dated November 21, 2024, indicating that the said letter was not considered as a motion and further ordered to file a formal motion to terminate representation with affidavit and memorandum of law by December 16, 2024, which shall be served on my client. It was further ordered that any response shall be due by January 6, 2025, and reply by January 13, 2025.

I state that I have not been able to contact Mr. Jonathan Anand to engage in a meaningful conversation as to continue as his attorney or to make a final decision to withdraw as attorney of record by filing a formal motion as ordered by the Honorable Court.

In addition, due to coming holidays it is difficult to contact Mr. Jonathan Anand in order to make a decision about withdrawing or continuing as his attorney.

In view of the above facts and circumstances, it is respectfully requested that I am seeking extension of another thirty (30) days to make a formal motion to withdraw or continue as attorney of record for Mr. Jonathan Anand. The reason for request is failure to contact and have a meaningful conversation with the client. This is the first request for extension and such request would not interfere with any scheduling order of the Honorable Court.

Thank you for your Honor's attention to this manner.

Respectfully,

/s/  
Sanjay Chaubey, Esq. (SC-3241)  
*Attorney for the Defendant*  
*Jonathan Anand*

CC: Nehemiah Salomon Glanc, Esq., Russell I. Zwerin, *Attorneys for Plaintiff* (Via ECF)